

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:
Rebecca M. Zeher : Case No. 20-20538-CMB
: :
Debtor(s) : Chapter 13
The Money Source Inc., its successors :
and/ or assigns :
Movant(s) : Related to Document 40
vs. : Hearing Date: 1/ 25/ 22 at 10:00 a.m.
Rebecca M. Zeher :
: :
Respondent(s) :
and :
Ashton Zeher :
Ronda J. Winnecour, Trustee :
Additional Respondent(s) :

**DEBTORS RESPONSE IN OPPOSITION TO MOTION FOR RELIEF
FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY**

1. The Money Source Inc., requests relief from stay with regard to the property located at 569 Kelso Road, Pittsburgh, PA 15243.
2. Movant has a claim secured by a mortgage lien on the property with a present payoff amount of \$220,924.01.
3. Municipality of Mt. Lebanon also has two claims secured by liens on the property in the amount of \$402.71 (claim 5) and \$202.59 (claim 6).
4. The Debtor believed the fair market value of the premises to \$284,999 based on comparable sells.
5. There appears to be a substantial equity cushion in the property that provides adequate protection for the creditor and relief from stay should be denied on that basis.

6. It is admitted that post-petition payments to Movant are delinquent, although Movant has received payments each month from June 2020 through December 2021 totaling \$33,186.69.

7. It is admitted that Debtor's plan payments are delinquent. Plan payment arrears through December 2021 total \$8,206.

8. Debtor's confirmed plan dated 03/ 07/ 2020 proposed to sell the 560 Kelso Road property to pay off the mortgage arrears and unsecured creditors. Counsel has been informed that the property will be listed this month with a new agent. The prior agent did not market the property appropriately. Given the market and location property should sell quickly.

9. The Debtor will resume plan payments and cure arrears while the property is marketed, so debtor can sell the property and realize its value.

WHEREFORE, the Debtor respectfully requests that the motion be denied.

Willis & Associates

Date: **January 7, 2022**

By: / s/ Lawrence Willis Esq
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PA 85299
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CERTIFICATE OF SERVICE

I hereby certify that on the 7th of January 2022, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail*, postage prepaid, addressed as follows: (parties served electronically not mailed)

Joseph S. Sisca, Esquire
Assistant U.S. Trustee
Suite 970, Liberty Center
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Pittsburgh PA. 15222

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